

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

CHARLES SEWELL  
DEBTOR

## CHAPTER 13

NEWREZ LLC D/B/A SHELLPOINT MORTGAGE  
SERVICING  
MOVANT

CASE NO. 17-15361-MDC

VS.  
CHARLES SEWELL  
DEBTOR

11 U.S.C. SECTION 362

WILLIAM C. MILLER, ESQ  
TRUSTEE

**NOTICE OF MOTION, RESPONSE DEADLINE AND  
HEARING DATE**

NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion, then on or before **Answer Filed May 3, 2021** you or your attorney must do all of the following:

(a) file an answer explaining your position at:

United States Bankruptcy Court  
Robert N.C. Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to Movant's attorney:

Joshua I. Goldman, Esq.  
PADGETT LAW GROUP  
6267 Old Water Oak Road, Suite 203  
Tallahassee, FL 32312

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman, the United States Bankruptcy Judge, in Courtroom #2 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, PA 19107-4299 on **January 4, 2022 at 10:30a.m.**, or as soon thereafter as counsel can be heard, to consider the motion.

4. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

5. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

/s/ Joshua I. Goldman

Joshua I. Goldman, Esq.  
Pennsylvania Bar # 205047  
PADGETT LAW GROUP  
6267 Old Water Oak Road, Suite 203  
Tallahassee, FL 32312  
(850) 422-2520 (telephone)  
(850) 422-2567 (facsimile)  
[josh.goldman@padgettlawgroup.com](mailto:josh.goldman@padgettlawgroup.com)  
*Counsel for Creditor*

November 16, 2021

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this the 16<sup>th</sup> day of November.

/s/ Joshua I. Goldman

Joshua I. Goldman, Esq.  
Pennsylvania Bar # 205047  
PADGETT LAW GROUP  
6267 Old Water Oak Road, Suite 203  
Tallahassee, FL 32312  
(850) 422-2520 (telephone)  
(850) 422-2567 (facsimile)  
[josh.goldman@padgettlawgroup.com](mailto:josh.goldman@padgettlawgroup.com)  
*Counsel for Creditor*

**SERVICE LIST (CASE NO. 17-15361-MDC)**

DEBTOR  
CHARLES SEWELL  
4104 SOPHIA LANE  
BOOTHWYN, PA 19061

NON-FILING CO-DEBTOR  
CYNTHIA KING AKA CYNTHIA SEWELL  
4104 SOPHIA LANE  
BOOTHWYN, PA 19061

ATTORNEY FOR DEBTOR  
JEFFREY M. CARBINO  
JENSEN BAGNATO, PC  
1500 WALNUT ST.  
SUITE 1510  
PHILADELPHIA, PA 19102

TRUSTEE  
WILLIAM C. MILLER, ESQ.  
CHAPTER 13 TRUSTEE  
P.O. BOX 1229  
PHILADELPHIA, PA 19105

U.S. TRUSTEE  
UNITED STATES TRUSTEE  
OFFICE OF THE U.S. TRUSTEE  
200 CHESTNUT STREET SUITE 502  
PHILADELPHIA, PA 19106